

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: John Conroy
Title: Vice President Regulatory,
Massachusetts

REQUEST: Attorney General, Set #5

DATED: November 26, 2001

ITEM: AG-VZ 5-1 Please refer to Attachment B to the surrebuttal testimony of AT&T witness Deborah Waldbaum, wherein the witness states "...it is Verizon's policy not to accept an order for [a T1] facility more than 30 days before the requested due date."

- a. Please corroborate that this is in fact Verizon's policy.
- b. If the response to (a) is in the affirmative, please explain why it is Verizon's policy not to accept an order for a T1 facility more than 30 days before the requested due date.
- c. If the response to (a) is in the affirmative, please indicate for which types of service this policy applies.
- d. If the response to (a) is in the affirmative, please provide a copy of Verizon's policy guidelines, training manuals, or any other documents which describe this policy.

REPLY: Verizon MA objects to this request on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of its objection, the Company replies as follows:

- a. This is not Verizon MA's policy. As stated in Verizon MA's tariffs: "The negotiated interval may not exceed by more than six months the standard interval service day, or, when there is no standard interval, the Telephone Company offered service date." Please see D.T.E. MA No. 15 section 3.1.6.A and F.C.C. No. 11 section 5.2.1.

REPLY: AG-VZ 5-1

(cont'd)

- b. Please see part (a)
- c. Please see Part (a)
- d. Please see Part (a)

VZ # 212

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: John Conroy
Title: Vice President Regulatory,
Massachusetts

REQUEST: Attorney General, Set #5

DATED: November 26, 2001

ITEM: AG-VZ 5-2 Assume for the purposes of this information request that a Verizon retail customer submits a request for transfer of its T1 service from one location in Boston to another, and that this request is made 60 days prior to the required service installation date.

- a. Does Verizon have a similar policy for retail service requests, wherein orders are denied if they are received more than a certain number of days before the requested due date?
- b. If the response to (a) is in the affirmative, please explain why Verizon maintains such a policy.
- c. If the response to (a) is in the affirmative, indicate the number of days before the requested due date that retail service requests are denied.
- d. If the response to (a) is in the affirmative, please indicate for which types of service this policy applies.
- e. If the response to (a) is in the affirmative, please provide a copy of Verizon's policy guidelines, training manuals, or any other documents which describe this policy.
- f. If the response to (a) is in the negative, please describe when such a retail service order request would be transferred to the plant department for provisioning.
- g. If the response to (a) is in the negative, please explain why Verizon has different policies regarding acceptance of customer orders depending on whether the request originates from a CLEC wholesale customer or Verizon MA retail customer.

REPLY: AG-VZ 5-2
(cont'd)

Verizon MA objects to this request on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of its objection, the Company replies as follows:

- a. Verizon MA's general practice is to accept a retail service request where the requested service date is within 60 days. However, Verizon MA will accept service requests with longer requested intervals.
- b. Please see part (a)
- c. Please see part (a)
- d. Please see part (a)
- e. Please see part (a)
- f. The order would be issued to the field for provisioning when the necessary facilities are made available and the order is "RID" (Record Issue Date), approximately 2 to 6 weeks prior to the requested due date.
- g. Please see part (a)

VZ # 213

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: William Taylor
Title: Senior Vice President, NERA

REQUEST: Attorney General, Set #5

DATED: November 26, 2001

ITEM: AG-VZ 5-3 Please refer to Dr. Taylor's November 14, 2001 reply to surrebuttal testimony, page 4, lines 17-23, in which Dr. Taylor asserts that "Verizon MA has no market power in the provision of those services being considered in this proceeding." Does this apply to every Verizon residential and business service throughout each wire center in Massachusetts? If not, to which services and to which wire centers was Dr. Taylor referring?

REPLY: Yes.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: John Conroy
Title: Vice President Regulatory,
Massachusetts

REQUEST: Attorney General, Set #5

DATED: November 26, 2001

ITEM: AG-VZ 5-4 Please refer to Verizon's response to DTE-VZ 4-3 and the Massachusetts Competitive Profile, Summary Exchange Data (May 2001 data) contained in the September 21, 2001 Rebuttal Testimony of Robert Mudge. Please provide a list of the Massachusetts exchanges that have:

- a. Less than five percent of lines provided by CLECs;
- b. Between five and ten percent of lines provided by CLECs;
- c. Between ten and twenty percent of lines provided by CLECs;
- d. Between twenty and thirty percent of lines provided by CLECs;
- e. Between thirty and forty percent of lines provided by CLECs;
- f. Over forty percent of lines provided by CLECs.

As with your response to DTE-VZ 4-3, please separate business lines from residential lines in your answer.

REPLY: Verizon MA considers certain data responsive to this request proprietary and competitively sensitive. That data will be made available to the extent provided for in a mutually agreeable Protective Agreement.

Verizon MA does not have precise data that would include all lines provided by competitors. The attachments described below were developed using data provided in the Massachusetts Competitive Profile, and do not represent precise market share calculations. The Profile is Verizon MA's estimate of the number of CLEC provided lines in the state. In assembling the Massachusetts Competitive Profile, Verizon MA was able to quantify the number of CLEC resold

REPLY: AG-VZ 5-4
(cont'd)

and UNE-P services through use of its internal sources. E911 data was used in the profile as a surrogate to estimate the number of CLEC facility based switched lines.

Please see Attachment 1, which provides the requested breakdown of offices for business services, and Attachment 2, which provides the requested breakdown of offices for residence services.

VZ # 215

**Verizon New England Inc.
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D.T.E. 01-31

Respondent: John Conroy
Title: Vice President Regulatory,
Massachusetts

REQUEST: Attorney General, Set #5

DATED: November 26, 2001

ITEM: AG-VZ 5-5 Please identify and describe the sources of the information used to respond to AG-VZ 5-4.

REPLY: As requested, the data used to provide the breakdown of offices in AG-VZ 5-4 comes from the summary section of the Massachusetts Competitive Profile. Please see the Introduction section of the Profile which details the sources of information used.

VZ # 216

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: John Conroy
Title: Vice President Regulatory,
Massachusetts

REQUEST: Attorney General, Set #5

DATED: November 26, 2001

ITEM: AG-VZ 5-6 Please provide a copy of Verizon MA's most recent monthly Quality of Service Report, including service measurements, Service Quality Index (SQI), monthly actual results for the SQI service measurement, current Wire Center Report, Major Service Outage notifications, installation and maintenance result for public access lines, monthly IntraLATA Presubscription Tracking Report of the Verizon MA toll market share, and compliance report on service quality measures mandated in DTE 99-77 (Town of Athol).

REPLY: Verizon MA considers Section 5 (Monthly IntraLATA Presubscription Tracking Report) of the Quality of Service Report to be proprietary and competitively sensitive. This information is being provided in the Company's reply to AG-VZ 5-7.

Attached is copy of Verizon MA's Quality of Service Report for the service month of October 2001 without Section 5.

VZ # 217

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Respondent: John Conroy
Title: Vice President Regulatory,
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REQUEST: Attorney General, Set #5

DATED: November 26, 2001

ITEM: AG-VZ 5-7 Please provide copies of the monthly Massachusetts IntraLATA Presubscription Tracking Reports for the time period from January 1, 2000, to date as reported to the DTE in Verizon MA's monthly Quality of Service Reports.

REPLY: Verizon MA considers certain data responsive to this request proprietary and competitively sensitive. That data will be made available to the extent provided for in a mutually agreeable Protective Agreement.

Attached are copies of the monthly Massachusetts IntraLATA Presubscription Tracking Reports from January 2000 through October 2001.

VZ # 218